

## **ARIZONA ADMINISTRATIVE CODE ARTICLE 5. TRAILER COACH PARKS**

We are being told that Article 5 of the Arizona Administrative code applies to RVs. It does not. The article makes no reference to RVs. All references are to “trailer coaches”. The clear intent of Article 5 of the state code is to address issues with “manufactured” or “mobile” homes not RVs. All parts of this section refer to “trailer coaches” in all instances. RVs are very different in that they are self-contained with holding tanks that “trailer coaches” do not have. The point of this part of the code is to address the necessity for a sewer system because “trailer coaches” are not self-contained. If RVs are included in this code then all semi-trucks with sleeper cabs would also have to be included. There would need to be a countywide ban on more than one truck stopping for the night on any property. There would also need to be a countywide ban on fairs and other similar events since many of the people involved stay in their RVs during the operation of the fair or other event.

Across the country there are many private and public campgrounds and other areas that have no sewer system where RVs are permitted to park for multiple days. Many National Parks and National Forests with no sewer system at all, allow multiple RVs to park for several days. Many of these are in the state of Arizona. The BLM allows RVs to park on millions of acres with no requirement for a sewer system, some areas within Pinal County. The county has many events held at the county fairgrounds without any sewer connection at any of the sites. Oak Flat Campground is just one example in Pinal County of a place that allows RV parking for several nights and has no sewer system.

Our impression is that, from the beginning of this process, there has been an attempt to find a way to accomplish the preconceived goal of severely limiting RV parking anywhere in the county except in approved campgrounds. Article 5 of the Arizona Administrative Code was chosen to try to accomplish this by trying to force RVs into the definition of “trailer coach”. RV parking on private property does not need to meet any requirements under Article 5 because RVs have self-contained waste systems and are not included in Article 5.